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August 21, 2020

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VIA ECF AND ELECTRONIC MAIL

Honorable Cecelia G. Morris
United States Bankruptcy Court
Southern District of New York
355 Main Street
Poughkeepsie, New York 12601-3315

Re: *Picard v. Michael Mann, et al.*, Adv. Pro. No. 10-04390 (CGM)

Dear Chief Judge Morris:

We are counsel to Plaintiff Irving H. Picard, Esq., as Trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC and the chapter 7 estate of Bernard L. Madoff, in the above-referenced adversary proceeding. We are in receipt of the Notice of Hearing setting the trial via Zoom for September 14, 2020, and write to respectfully request a brief conference in advance of the trial to discuss the logistics for the virtual trial.

We had previously discussed with Judge Stuart M. Bernstein using Veritext Virtual for the remote trial, which we expect to last no more than a day. The remote trial platform offered by Veritext, the court's approved transcription vendor, provides for video and document display using the Zoom enterprise version for enhanced security. Veritext would also provide real-time and certified transcription within its platform. We would like to discuss whether Your Honor is amenable to using Veritext Virtual or whether the Court has a preference for another platform.

In addition, we have reviewed Your Honor's trial rules and note that the hard copies of the exhibits are required to be exchanged between the parties 14 days in advance of the trial date. We would like to clarify if the Court will require hard copies of the exhibits in advance of the trial and whether the Court would be amenable to electronic pre-marked copies of the exhibits in light of the current pandemic.

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We thank Your Honor for consideration of this request.

Respectfully,

/s/ Lan Hoang

Lan Hoang

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